

Matter 1: Statutory / Regulatory Requirements – Ian Cowan Response

1.1: Cooperation with neighbouring authorities

1.1(a): The Plan claims there has been cooperation, and no doubt some has occurred. However, based on the following criticisms, so far as jobs numbers are concerned, this was a mere box ticking exercise rather than a rigorous assessment of evidence. The effectiveness of this cooperation fails by not being constructive, active or ongoing. While jobs numbers will be discussed in detail elsewhere, it is appropriate to consider this within the context of inter-authority cooperation.

Note: The following definitions apply -

1. Constructive - *“Being useful and intended to help or improve”*.
2. Active - *“Characterized by movement and action”*.
3. Ongoing - *“Continuing to exist or develop”*.

1.1(b): Table 2.3 of the Plan states that a total of 30,320 jobs will be created between 2018 and 2036 in the Ipswich Strategic Planning Area (ISPA), meaning Babergh, Ipswich, Mid-Suffolk and Suffolk Coastal. Surprisingly, this figure does not include Waveney, with whom SCDC have shared services for some years and are now the combined East Suffolk DC. If the 5,000 Waveney job aspirations are included, this brings the total to 35,320.

1.1(c): On page 3 of its response to the Inspector's letter of 20 May, the Council states: *“In preparing the Local Plan, the Council has worked with neighbouring authorities to consider economic needs, land requirements, sector requirements and identifying the Functional Economic Area.”* Note 1 explains that these *“neighbouring authorities”* were *“Babergh DC, Ipswich BC, Mid Suffolk DC, and SCDC.”* This confirms that there was no consultation with Waveney!

1.1(c): The myth that 6,500 new jobs will be created is explained in detail elsewhere.

1.1(d): It is probable that the lack of credibility regarding the creation of 6,500 jobs in the District also applies to the 35,320 jobs that will supposedly be created in this and neighbouring Districts and will not be referred to in detail as part of Matter 1. They have been referred to throughout my responses as *The Elephants In The Room*, the details of which have been summarised in every Appendix.

1.1(e) - Soundness: The failure of the Council to engage with Waveney means that cooperation has been unsound. If 6,500 jobs will never be created in the District, and numbers have been similarly calculated elsewhere, it is clear that the grand total of 35,320 new jobs is grossly overstated and makes a mockery of the effectiveness and thoroughness of cooperation. Ticking boxes is insufficient. For Plan soundness, proper cooperation must be effectively engaged to ensure that jobs numbers: (a) are evidence based (b) take account of known historic and future economic influences, including jobs losses and (c) can stand up to rigorous scrutiny. There must be proof that cooperation has been constructive, active and ongoing.

Matter 1: Climate Change Policies – Ian Cowan Response

1.9: Climate Change Mitigation

1.9(a): Partly due to its low-lying nature, Climate Change/Global Warming will have adverse impacts within the District. However, the District should not be considered in isolation, because Climate Change/Global Warming will have adverse consequences throughout the UK and globally. Major consequences are listed in the Appendix.

1.9(b): The impact and consequences of the 1953 North Sea flooding are relevant. Relevant comments in the “Environment Agency - Coastal Habitats 2100: The East Coast Response to Tidal Surges - Project Report”, published online in May 2014 are summarised in the Appendix.

1.9(c): According to “Climate Change – What Risk To Suffolk” published online by www.greensuffolk.org: *“Climate change will have a wide range of implications for all of us: water shortages, flooding, heat waves, changing disease patterns, changing biodiversity and increased risk of crop/animal diseases. Worldwide, extreme weather events will occur more frequently. Not only will these impact directly on the UK but we could also experience knock-on effects from impacts on other parts of the world, such as changes in food supply and security, political stability and migration patterns ... It is therefore vitally important that planning policies are sufficiently robust to ensure development is located appropriately and that the design of infrastructure, homes and businesses can better cope with more frequent extreme weather events and the related consequences.”*

1.9(d): With a growing UK and global population the competition for food and water will increase significantly as the century progresses. This will be worsened by local and global consequences of Climate Change/Global Warming.

1.9(e): Not only is the District largely rural, it also boasts the most fertile farmland in the UK. Therefore it is essential to make a long-term strategic decision regarding its priorities: food production or jobs and housing.

1.9(f): As discussed elsewhere, and described throughout my Submissions as The Elephants In The Room: (a) 6,500 jobs will not be created over the Plan's lifetime (b) large numbers of prospective employees will not move here and (c) there will be no need for thousands of extra houses.

1.9(g): The following East Anglian statistics are relevant -

1. Three quarters of the land is agricultural.
2. It grows a third of the nation's potatoes and two thirds of its sugar beet.
3. It is ideal for growing wheat, barley and other combinable crops (gathered by a combine harvester).
4. It is the UK's centre for pig and poultry farming.

1.9(h): The following Paragraphs of the NPPF are equally relevant -

1. Paragraph 8: *“[The Environmental Objective] is to contribute to protecting and enhancing our natural ... environment, including making effective use of land ... and mitigating and adapting to climate change.”* As the nation's breadbasket, the District's farmland must be protected and enhanced: (a) to retain food production capacity and (b) to mitigate Climate Change/Global Warming.
2. Paragraph 60: *“Exceptional circumstances justify an alternative approach which also reflects future demographic trends and market signals”*. The District is clearly exceptional and its agricultural nature must be retained and protected.

Consequently, for the strategic benefit of the nation the choice has to be: (a) concentration on food production rather than (b) the wholesale destruction of farmland in favour of jobs that will never materialise and houses that will not be needed. It would be economic, environmental and strategic folly to make the wrong decision!

1.9(i): In addition, the NPPF makes specific references to Climate Change, which are described in the Appendix. There are no strategic policies in the Plan that specifically or effectively address them.

1.9(j): The NPPF defines “*Climate Change Mitigation*” as: “*Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.*” Although burning carbon fuel is a major source of greenhouse gases, they are also caused by changes in land use and human activities associated with these changes. The Plan will result in significant destruction of farmland through: (a) the allocation of 11.7 hectares for business purposes plus (b) the allocation of at least 116 hectares for the Innocence Farm Project plus (c) hundreds of hectares for thousands of houses. There is no effective “*action*” within the Plan which will reduce the strategically disastrous impacts of human activity.

1.9(k) - Soundness: While the planet is threatened with Climate Change/Global Warming there is no justification for destroying irreplaceable food producing farmland in the District. Nor is there effective action in the Plan to mitigate its impacts, including greenhouse gases. Therefore, purely for the strategic protection of the means of UK food production, the Plan is unsound regarding the creation of non-existent jobs and the lack of need for housing. Jobs numbers and housing numbers must be reassessed according to robust, verifiable evidence rather than abstract formulae which fail to recognise that the District is exceptional because of its rural nature. Its irreplaceable food producing capabilities must be protected at all costs. In this context, The Elephants In The Room cannot be referred to often enough. In summary, the following Paragraphs of the NPPF support my arguments -

1. Paragraph 8: The Environmental Objective promotes the protection and enhancement of the natural environment, including farmland.
2. Paragraph 20: Strategic policies should conserve the natural environment.
3. Paragraph 60: The agricultural nature of the District means it is strategically exceptional and deserving of protection from unnecessary development. In addition, market signals show that there will be little, if any, jobs creation.
4. Paragraph 149: There should be mitigation of the risks of flooding, coastal change and diminishing water supplies.
5. Paragraph 150: New developments should not increase the vulnerability to Climate Change impacts.

1.9(a): Consequences of Climate Change/Global Warming -

1. Higher and more extreme tides.
2. Increased storminess.
3. More intense rainfall events.
4. Irreplaceable food producing farmland lost to the sea.
5. According to the Anglian Water website: “*50% of our supply is from surface water (reservoirs and rivers) and 50% of our supply is from groundwater stored in underground aquifers.*”
6. A decreased volume of water in reservoirs, rivers and aquifers will adversely impact on domestic, agricultural and commercial water supplies.
7. Following on from this: (a) agricultural land will be less fertile (b) there will be fewer crop varieties and (c) yields will diminish.

Matter One – Appendix – Ian Cowan

The Elephants In The Room -

1. FOIA correspondence confirms there is no evidence that sufficient numbers of jobs have already been created to support the Plan's aspirations.
2. If any jobs are created, they will “*predominantly*” arise in employment categories that will not provide sufficient numbers to come anywhere near the total aspiration, nor will many of these employees be able to afford “*market value*” homes.
3. These jobs are identified at Paragraph 3.17 in the Plan as being: “*service, tourism, business and professional services*”.
4. Jobs will not arise at the three major employers, namely the Port of Felixstowe, BT/Adastral and Sizewell.
5. In addition, their description as “*key economic drivers*” is meaningless with regards to future economic impact.
6. The jobs figure is gross, and takes no account of future jobs losses. If jobs numbers have been calculated elsewhere on the same basis, they have also failed to take account of losses.
7. Specifically, jobs will be lost at the Port and BT/Adastral.
8. Businesses continually strive for economies of scale, including rationalisation and redundancies, a prime example being the amalgamation of SCDC and Waveney.
9. No account has been taken of jobs losses through the implementation of robotics and artificial intelligence. The Heatmap on Page 15 of my Consultation response indicates that considerable numbers of jobs could be lost.
10. Specific market signals include the lack of progress at the 2,000 homes housing development at Brightwell Lakes and the abandonment of the Uniserve Super Distribution Centre at the Port.
11. Micro/Small/Medium Businesses will have an insignificant impact on jobs growth.
12. According to Paragraphs 2.15 and 2.16 of the Plan, growth will not be sustainable until significant improvements to the A12, A14 and Orwell Bridge and the Northern Ipswich bypass has been completed.

1.9(b): The impact and consequences of the 1953 North Sea flooding -

1. *“On 5th and 6th December 2013 the largest storm surge in 60 years hit the East Coast of England, causing extensive damage to property and habitats. The Intergovernmental Panel on Climate Change predicts with confidence that in the 21st Century sea levels will rise, the rate at which sea levels continue to rise year on year will increase, and that storm events will become more frequent. Climate change driven sea-level rise means that the likelihood of events such as that which occurred in December 2013 is increasing.”*
2. *“The tidal surge along the East Coast of England occurred on 5th and 6th December 2013 and caused extensive flooding, damage to property and infrastructure and disruption. The magnitude of the surge tide was the largest such event in 60 years; the last such event on this scale was in 1953.”*
3. *“With respect to average areas at risk of [habitat] loss, South-West and Anglian region are almost identical under current climate conditions (1,635 ha for South-West and 1,634 ha for Anglian) (Defra CR0422, Entec, 2010).”*

1.9(i): NPPF references to Climate Change -

1. Paragraph 20: *“Strategic policies should ... make sufficient provision for ... conservation and enhancement of the natural, build and historic environment ... and planning measures to address climate change mitigation and adaptation.”*
2. Paragraph 149: *“Plans should take a proactive approach to mitigating and adapting to ... flood, risk, coastal change, water supply ... and the risk of overheating from rising*

temperatures.”

3. Paragraph 150: *“New developments ... should avoid increased vulnerability to the range of impacts arising from climate change.”*